GARDEPHE

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

FTC Capital Markets, Inc., FTC Emerging Markets, Inc., also d/b/a FTC Group, Guillermo David Clamens, Lina Lopez a/k/a Nazly Cucunuba Lopez,

- against -

Defendants.

**ECF** Case

09 Civ. 4755 (PGG)

## STIPULATION AND PROPOSED ORDER

It is hereby stipulated and agreed that in connection with the Stipulation and Order entered on December 15, 2009 the following additional actions be taken to facilitate winding down the business operations of FTC London UK Ltd. so that the remaining balances in the accounts at Courts Bank, 440 Strand, London WC2R OQS, held in the name of FTC London UK Ltd. can be transferred to the United States: (1) Account No. 00176915, sort code 1-80000-2; (2) Account No. 00176907, sort code 1-80000-2; and (3) Account No. 10381309, sort code 1-800-91 (the "Accounts").

Guillermo David Clamens and FTC London UK Ltd. are expressly authorized by the parties and directed by the Court to make additional payments as required from the Accounts, not to exceed £25,000, to Reed Smith for the sole purpose of representing FTC London UK Ltd.

regarding claim number CL985029 filed in Central London County Court by former FTC

London UK employee Marielle Lukaczyk.

Stipulated And Agreed To By:

SECURITIES AND EXCHANGE

COMMISSION

JACK KAUFMAN (JK-3050) RHONDA JUNG (RJ-3864)

Attorneys for Plaintiff

FOX HORAN & CAMERINI LLP

WILLIAM M. BRODSKY (WB 4398)

V. DAVID RIVKIN (VR 6734) Attorneys for Defendants

SO ORDERED:

UNITED STATES DISTRICT COURT JUDGE

New York, New York